## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI NORTHERN DIVISION

J.W. PLAINTIFFS

V. CASE NO.: 3:21-cv-00663-CWR-LGI

THE CITY OF JACKSON, ET AL.

DEFENDANTS

and

P.R., ET AL. PLAINTIFFS

V. CASE NO.: 3:21-cv-00667-CWR-LGI

THE CITY OF JACKSON, ET AL.

DEFENDANTS

and

C.A., ET AL. PLAINTIFFS

V. CASE NO.: 3:22-cv-00171-CWR-LGI

THE CITY OF JACKSON, ET AL. DEFENDANTS

## CITY OF JACKSON'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REBUTTAL BRIEF IN SUPPORT OF DISPOSITIVE MOTION

Defendant City of Jackson (the "City"), by its counsel and pursuant to Federal Rule of Civil Procedure 6(b)(1), respectfully requests an extension of time, through and including September 19, 2022, to file its Rebuttal Brief in Support of its *Motion for Judgment on the Pleadings* [21-663, ECF No. 80; 21-667, ECF No. 74; and 22-171, ECF No. 42], and further states as follows:

Plaintiffs' Response in Opposition [Dkt. 113] and Memorandum Brief in Opposition [Dkt. 114] (collectively, the "Response in Opposition") to City of Jackson's Motion for Judgment on the Pleadings [21-663, ECF No. 80; 21-667, ECF No. 74; and 22-171, ECF No. 42] were filed on August 22, 2022.

Pursuant to the Court's Text-Only Order entered July 15, 2022, the City's rebuttal brief in

response to Plaintiffs' Response in Opposition is currently due on Monday, September 12, 2022.

The City and its counsel require additional time to respond to the allegations and claims

made by Plaintiff. Accordingly, the City respectfully requests a seven (7) day extension of the

deadline to file its rebuttal brief in response to Plaintiffs' Response in Opposition, up to and

including September 19, 2022.

This motion is made in good faith, not for purposes of delay, and granting it will not

prejudice any party. This extension of time will allow the City sufficient time to fully investigate

the allegations and claims raised in Plaintiffs' Response in Opposition, confer with counsel, and

prepare its rebuttal brief.

On September 2, the City's counsel conferred with Plaintiffs' counsel regarding the basis

for this request and the need for an extension of time. Plaintiffs' counsel had no objection to a

seven (7) day extension and provided Plaintiffs' consent to the requested extension.

For these reasons, Defendant the City of Jackson respectfully requests that this Court grant

its request for an extension of time to respond to Plaintiffs' Response in Opposition, up to and

including September 19, 2022.

RESPECTFULLY SUBMITTED, this the 9<sup>th</sup> day of September, 2022.

s/ Clarence Webster, III

CLARENCE WEBSTER, III

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## **CERTIFICATE OF SERVICE**

I hereby certify that on September 9, 2022, I electronically filed the foregoing pleading with the Clerk of the Court using the CM/ECF system which served a copy of the foregoing on all counsel of record.

/s/ Clarence Webster, III
CLARENCE WEBSTER, III